<u>REMARKS</u>

Applicant respectfully requests reconsideration of this application as amended. Claims 20-44 are currently pending in this application. No claims have been amended, and no claims have been canceled.

Non-statutory Double Patenting

Claims 20-44 were rejected under nonstatutory double patenting as being unpatentable over claims 1-57 of U.S. Patent Number 6,690,536, claims 1-2 of U.S. Patent Number 6,396,474, claims 1-5 of U.S. Patent Number 5,694,151, and claims 1-21 of U.S. Patent Number 5,561,444. Applicant respectfully disagrees.

Independent claim 20 claims moving the text object following the visible symbol from the source location of the first window to a destination location of a second window and displaying the selected text at the second location of the second window. None of the patent references enumerated above disclose these limitations, nor do they make such limitations obvious. Thus, none of the four patent references enumerated above represent a proper basis for a nonstatutory double patenting rejection of independent claim 20. Independent claims 28, 36, and 44 recite similar limitations and are therefore improperly rejected as well. The remaining claims depend, directly or indirectly, upon independent claims 20, 28, 36, and 44 and are therefore improperly rejected as well at least for the reasons argued above.

If Examiner insists upon the nonstatutory double patenting rejections, Applicant, to further prosecution, will file terminal disclaimers upon an indication of otherwise allowable subject matter in the instant application.

Claims 20-44 were rejected under 35 U.S.C. 102(e), as being anticipated by Greyson, U.S. Patent 5,442,742. Applicant respectfully disagrees.

Claim 20 recites the limitations, "moving the text object following the visible symbol from the source location of the first window to a destination location of a second window while the button of the control device is the second position; and displaying the selected text at the second location of the second window identified via an insertion caret when the button of the control device is in a first position."

Greyson discloses a True Buffer and a Scratch Buffer. The True Buffer contains an exact representation of one full page of **the available text**. The selected and unselected portions of available text displayed on the screen display screen are initially maintained in the True Buffer. The Scratch Buffer is used to render and display the selected block of text as it is moved around the display screen. Once the signal generation device is deactivated, the selected text block is merged into **the available text** at a position corresponding to that indicated by the insertion marker. (Greyson, col. 11, line 25 through col. 12, line 64).

Selected text originates in the True Buffer and is inserted back into the True Buffer. As noted, the True Buffer contains a full page of the available text. Thus, the True Buffer contains a page of text from a single document. A single document is displayed in a single window. Thus, Greyson discloses a system in which text may be selected and moved within a page of a document displayed in a window on a display screen.

Since Greyson discloses only text selected and inserted in a single window, Greyson does not disclose the claimed limitations (e.g., across different windows) and therefore cannot anticipate claim 20.

Claim 28 recites the limitations, "moving the text object following the visible symbol from the source location of the first window to a destination location of a second window while the button of the control device is the second position; and displaying the selected text at the second location of the second window identified via an insertion caret when the button of the control device is in a first position." As argued above in conjunction with claim 20, Greyson does not disclose this limitation. Therefore, Greyson cannot anticipate claim 28.

Claim 36 recites the limitations, "means for moving the text object following the visible symbol from the source location of the first window to a destination location of a second window while the button of the control device is the second position; and means for displaying the selected text at the second location of the second window identified via an insertion caret when the button of the control device is in a first position." As argued above in conjunction with claim 20, Greyson does not disclose this limitation. Therefore, Greyson cannot anticipate claim 36.

Claim 44 recites the limitations, "moving the text object following the visible symbol from the source location of the first window to a destination location of a second window while the button of the control device is the second position, and displaying the selected text at the second location of the second window identified via an insertion caret when the button of the control device is in the first position." As argued above in conjunction with claim 20, Greyson does not disclose this limitation. Therefore, Greyson cannot anticipate claim 44.

The remaining claims depend, directly or indirectly, upon independent claims 20, 28, 36 and 44 and are therefore patentable over Greyson at least for the reasons argued above.

In light of the foregoing arguments applicant believes that claims

20-44 are not anticipated by Greyson, and respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. 102(e).

Claim Rejections - 35 U.S.C. §102

Claims 20-44 were rejected under 35 U.S.C. 102(b), as being anticipated by Alpert," A Technique for Improving the Interactivity of Direct Manipulation", IBM Technical Disclosure Bulletin. Applicant respectfully disagrees.

Claim 20 recites the limitations, "moving the text object following the visible symbol from the source location of the first window to a destination location of a second window while the button of the control device is the second position; and displaying the selected text at the second location of the second window identified via an insertion caret when the button of the control device is in a first position."

Alpert describes a "pause preview" system allowing a user to preview the results of a copying procedure before committing to the procedure. Applicant respectfully submits that Alpert does not disclose the claimed limitations, and therefore, claims 20-44 are patentable over Alpert for similar reasons to those argued above in conjunction with Greyson.

Further, Alpert discloses a system antithetical to the instant invention. Alpert states that displaying graphic effects of moving selected text would be computationally prohibitive, and as such, should not be displayed until the user pauses in their motion. (Alpert, page 22). The disclosure of Alpert positively contradicts the claimed limitation "moving the text object following the visible symbol from the source location of the first window to a destination location of a second window while the button of the control device is in the second position." Thus, Alpert teaches away from the present invention as claimed.

Therefore, Alpert fails to anticipate the claimed invention in a manner similar to Greyson, and due to positive contradictions of the claimed invention.

In light of the foregoing arguments applicant believes that claims 20-44 are not anticipated by Alpert, and respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. 102(b).

Applicant respectfully submits that in view of the amendments and arguments set forth herein, the applicable rejections have been overcome.

Please charge any shortages and credit any overcharges to our Deposit Account No. 02-2666.

Respectfully submitted,

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